

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DANZAS CORPORATION d/b/a DHL DANZAS
AIR & OCEAN,

Plaintiff,

- against -

KROFTA TECHNOLOGIES CORPORATION,
PETER R. KIRCHNER, MICHAEL NOYES,
NORTHEAST FABRICATORS & MECHANICAL
SERVICES, LLC, and DANIEL SHEPARD,

Defendants.

Civil Case no.: 04-30219-MAP

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

The attorneys for all of the parties have reached an agreement for a proposed
Pretrial Schedule as follows:

A. Proposed Pre-Trial Schedule

1. Initial disclosures by: February 18, 2005
2. Amendments to pleadings to add parties by: February 25, 2005
3. Completion of written discovery and fact depositions by: July 1, 2005
4. Plaintiff's designation of expert witnesses by: August 5, 2005
5. Defendant's designation of expert witness by: September 9, 2005
6. Completion of Expert depositions by: October 1, 2005
7. Dispositive Motions to be served by: November 18, 2005
8. Opposition to Dispositive Motions to be served by: December 23, 2005
9. Reply to Oppositions to be served by: January 13, 2006
10. A Final Pre-Trial Conference shall be held on or before January 23, 2006 or other date to be set at the convenience of the Court.

- B. Defendant Shepard consents to trial by Magistrate Judge, the other parties have not yet determined whether they will consent to trial by Magistrate Judge.
- C. The plaintiff has presented a written settlement proposal to the defendants.
- D. The parties' certifications pursuant to Local Rule 16.1(D)(3) will have or have been submitted.

Dated: January 28, 2004

DANZAS CORPORATION

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KROFTA TECHNOLOGIES CORPORATION,
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NORTHEAST FABRICATORS & MECHANICAL
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DANIEL SHEPARD

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